

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
CEDAR RAPIDS DIVISION**

ALBERT S. WOLOGO,

Plaintiff,

v.

TRANSAMERICA LIFE INSURANCE  
COMPANY and AEGON USA  
INVESTMENT MANAGEMENT,

Defendants.

1:17-cv-00136-MWB

**AFFIDAVIT OF WILFORD H. STONE  
REQUIRED UNDER SECTION IV OF  
THE SUPPLEMENTAL TRIAL  
MANAGEMENT ORDER [ECF Doc. 57]**

I, Wilford H. Stone, swear or affirm under penalty of perjury:

1. I am one of the attorneys for the Defendants in this matter.
2. I am providing this Affidavit in accordance with section IV of the Supplemental

Trial Management Order [ECF Doc. 57].

3. I read Steve D. Susman and Thomas M. Melsheimer, *Trial by Agreement: How Trial Lawyers Hold the Key to Improving Jury Trials in Civil Cases*, 32 REV. LITIG. 431 (2013).

4. I also read *Pretrial Agreements Made Easy*, found at <http://trialbyagreement.com/pretrial-agreements/pretrial-agreemetns-made-easy>.

5. I am willing to make a good faith effort to apply the basic principles of the Susman and Melsheimer article and the concepts contained in *Pretrial Agreements Made Easy* to this case.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on January 8, 2018.

  
\_\_\_\_\_  
Wilford H. Stone

Subscribed and sworn to before me by Wilford H. Stone on this 8th day of January, 2018.

Kimberly Brown  
Notary Public, State of Iowa

